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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

In re RIPPLE LABS, INC. LITIGATION

Case No. 4:18-cv-06753-PJH (RMI)

DISCOVERY MATTER

CLASS ACTION

This Document Relates to:

All Actions

**JOINT STIPULATION AND
 [PROPOSED] ORDER RE DOCUMENT
 PRODUCTION**

1 Lead Plaintiff Bradley Sostack and Defendants Ripple Labs Inc., XRP II, LLC, and Bradley
2 Garlinghouse (collectively the “Parties”), by and through undersigned counsel, hereby stipulate to
3 the following:

4 WHEREAS, Defendants are involved in litigation against the Securities and Exchange
5 Commission in *Securities and Exchange Commission v. Ripple Labs Inc.*, Case No. 1:20-cv-
6 10832-AT-SN (S.D.N.Y.) (hereafter, the “SEC Action”);

7 WHEREAS, videotaped depositions took place in the SEC Action;

8 WHEREAS, Defendants have produced transcripts of these depositions to Lead Plaintiff
9 in this action, with the transcripts of Ethan Beard and Chris Larsen containing redactions;

10 WHEREAS, Lead Plaintiff has requested, and Defendants have agreed to produce, subject
11 to their objections, the video files of these depositions; and

12 WHEREAS, producing these videos in the manner required by the “Stipulated Order re:
13 Discovery of Electronically Stored Information for Standard Litigation as Modified by the Court,”
14 Dkt. 121 (“ESI Order”), would be costly, time-consuming, and unduly burdensome.

15 NOW THEREFORE, IT IS HEREBY STIPULATED by and between Lead Plaintiff and
16 Defendants, through their respective counsel, that:

17 1. Defendants’ production of the deposition videos does not need to comply with the
18 ESI Order.

19 2. For all depositions other than the Beard and Larsen depositions, Defendants will
20 load the videos onto an FTP and will send Lead Plaintiff a link. Defendants will send Lead Plaintiff
21 an accounting of costs related to the production of these videos, and Lead Plaintiff will pay up to
22 \$1,000 to Defendants in relation to the production of these videos.

23 3. For the Beard and Larsen depositions, Lead Plaintiff will retain a third-party video
24 editor to edit out the redacted portions of the depositions and will provide the name and contact
25 information of the video editor to Defendants. Defendants will send the videos and redaction
26 instructions to the video editor, and will receive the videos back after editing for review.
27 Defendants will then produce those videos to Lead Plaintiff using an FTP. Lead Plaintiff will be
28

responsible for the cost of the video editor. Defendants will be responsible for all other costs in relation to the production of the Beard and Larsen depositions.

IT IS SO STIPULATED.

DATED: April 7, 2023

By: /s/ Nicholas N. Spear

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*Attorneys for Defendants Ripple Labs Inc.,
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ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I attest that concurrence in the filing of this document has been obtained from the other signatories.

DATED: April 7, 2023

/s/ Nicholas N. Spear
Nicholas N. Spear

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____, 2023

The Honorable Phyllis J. Hamilton